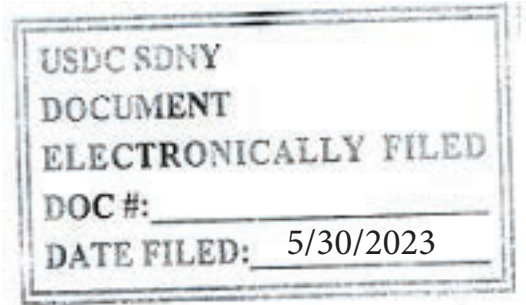


MEMO ENDORSED

LAUREN DI CHIARA
Attorney-at-Law

585 Stewart Avenue, L16
Garden City, NY 11530



Tel: (516) 695 – 6801

Email: laurendichiara.law@gmail.com
Admitted in SDNY, EDNY, USSC, NY & CT

May 26, 2023

Via ECF Filing

The Honorable Nelson S. Roman
United State District Judge
Southern District of New York
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *United States v. Ysenni Gomez*, 22 Cr. 526 (NSR)

Dear Judge Roman:

I represent Ysenni Gomez in the above-referenced matter. I write now without opposition from the Government and Pretrial Services to request a modification to Ms. Gomez's bail conditions. The specific request is made to further inform the Court as to reasons why the amendment from home incarceration to home detention should continue beyond one week.

Ms. Gomez has attended a week of services at Exodus. The services thus far have included various aspects of training in furtherance of seeking gainful employment. I have spoken with Hector Lopez, who is a Senior Case Manager at Exodus, and he has informed me that she has been approved to continue services through Exodus. It is anticipated that next week (May 30, 2023 – June 2, 2023), Ms. Gomez would continue participating in the Wilderness Program, where in addition to the resume building and interview training which will be further developed, she will be assigned to a personal Job Developer. The Job Developer will work with Ms. Gomez one-on-one to explore different employment opportunities and the Job Developer will utilize a cultivated job bank to help locate job placement in an area of interest for her as well as based on her current circumstances. During next week (and on a weekly basis thereafter as needed) it is anticipated that there will be applications to jobs and hopefully during the course of next week or the coming weeks they will, all together be able to attain job interviews for Ms. Gomez.

Furthermore, Exodus has a Trauma Center which Ms. Gomez is eligible to participate in and has begun the process of intake with so that she may avail herself of the services it can provide to further round out her work with Exodus. I have spoken with Francisco Cordero a therapist who Ms. Gomez met with on Thursday, May 25, 2023, and he has indicated to me that Ms. Gomez has been accepted in both a Group Therapy and Individual Therapy expected to take place on Tuesday from 4-6 and for at minimum a one hour block (yet to be determined) on Thursday. The therapy would continue weekly at that frequency with more services available as needed.

The request for Bail Modification from home incarceration to home detention will allow Pretrial to more readily review Ms. Gomez's requests to attend job placement training as well as attend job interviews when the interviews are established. Furthermore, the Ms. Gomez would benefit from the services anticipated through Exodus' Trauma Center on a weekly basis.

Pretrial Services Officer Jonathan Lettieri has advised me that Ms. Gomez remains in compliance with no issues to report. Furthermore, Officer Lettieri has informed me that Pretrial would prefer home detention to facilitate approval of her attendance to this program and any follow-up interviews and potential job placement which may result from the program. I have also communicated with AUSA Kaiya Arroyo regarding this request. AUSA Arroyo has indicated in an email that the Government has no objection to the proposed modification to amend Ms. Gomez's conditions from home incarceration to home detention and defers to the position of Pretrial Services with respect to this request.

Thank you for the Court's consideration of this request.

Respectfully Submitted,

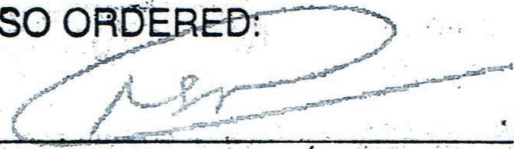
/s/ Lauren Di Chiara

CC: AUSA Kaiya Arroyo
Pretrial Services Officer Jonathan Lettieri
(both via ECF and email)

The Court GRANTS Defendant's request for bail modification from the current requirement of home incarceration to home detention without objection by the Government and with the Pretrial Officer's preference for this modification. Clerk of Court is requested to terminate the motion at ECF No. 33.

**Dated: White Plains, NY
May 30, 2023**

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE